

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

CITY OF CHICOPEE, Acting through the
Chicopee Public Schools,
Plaintiff

v.
DAVID T. As Parent and next friend of
Kaitlyn T. and MASSACHUSETTS
DEPARTMENT OF EDUCATION,
Defendants

KAITLYN T., DAVID THARALDSON AND
DIANE THARALDSON,
Plaintiffs

v.
CHICOPEE PUBLIC SCHOOLS AND THE
CITY OF CHICOPEE,
Defendants

Case No: 04-30087-MAP

Case No: 04-30086-KPN

**MOTION OF THE CHICOPEE PUBLIC SCHOOLS TO
RESCHEDULE SCHEDULING CONFERENCE**

Now comes the Chicopee Public Schools (“Chicopee”) and respectfully requests that this Honorable Court reschedule its Scheduling Conference in the above-entitled matters from July 28, 2004 to August 4, 2004.

In support of this motion, Chicopee states that its undersigned counsel will be on a prepaid, nonrefundable vacation from July 25, 2004 through August 2, 2004. Counsel will be vacationing out of the country and unavailable to represent Chicopee in this matter on July 28, 2004. Counsel is the only attorney in her firm who represents Chicopee and handles special education disputes such as the above-entitled matters.

Counsel for Chicopee spoke with Bethany Healy, Clerk to Magistrate Judge Neiman and determined that the Court is available for a scheduling conference in these matters on August 4, 2004. Counsel further determined that Attorney Derek Beaulieu who represents Kaitlyn T. and her family is also available on August 4, 2004.

WHEREFORE, Chicopee hereby moves to reschedule the Court's Scheduling Conference in these matters from July 28, 2004 at 11:30 a.m. to anytime on August 4, 2004.

FOR PLAINTIFF,
CITY OF CHICOPEE ACTING
THROUGH THE CHICOPEE PUBLIC
SCHOOLS

By /s/ Claire L. Thompson
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CERTIFICATE OF SERVICE

I certify that this document has been served upon all counsel of record in compliance with F.R.C.P., on July 15, 2004.

/s/ Claire L. Thompson
Claire L. Thompson